



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

SFUND RECORDS CTR
2054952

31 August 2004

Sent Overnight Delivery

Ms. Lisa Woods Munger
Goodsill Anderson Quinn & Stifel
1099 Alakea Street
Suite 1800
Honolulu, HI 96813

Re: Administrative Order on Consent for Additional Site Characterization
Oahu Sugar Pesticide Mixing Area, Waipio Peninsula, Pearl Harbor, Oahu, HI
Pearl Harbor Naval Complex Superfund Site (PHNC)

Dear Ms. Munger:

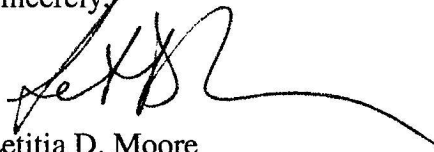
Pursuant to our discussion, please find enclosed an Administrative Order on Consent ("AOC") for performance of remedial investigation activities at the former Oahu Sugar pesticide mixing area on the Waipio Peninsula, in Pearl Harbor, Oahu, Hawaii, located within the Pearl Harbor Naval Complex Superfund Site (hereinafter, the "OSCO Site"). The enclosed AOC references the Work Plan for Additional Site Characterization ("Work Plan") that your client has been working on with EPA. The final Work Plan will be Attachment A to the AOC. Also enclosed for your review is a Proposed Schedule for completion of the work required by the Work Plan. I suggest that we make the Proposed Schedule part of the Work Plan.

As you know, EPA is very concerned about the high concentrations of dioxins/furans, semi-volatile organic compounds, organochlorine pesticides and metals detected in soils at the OSCO Site. Under the terms of the enclosed AOC and Proposed Schedule, your client will determine the nature and extent of contamination and the OSCO Site and any threat to the public health, welfare, or the environment posed by such contamination. The Proposed Schedule is designed for completion of such determinations in a reasonably expeditious manner.

Please review the enclosed AOC and Proposed Schedule with your client. The AOC includes the standard requirements and reservations usually included in such EPA Orders. I suggest that we discuss the few issues that remain outstanding with the Work Plan and any concerns or comments that you may have with the AOC and Proposed Schedule on or before Monday, September 20, 2004. Based on the 9 July 2004 letter from BEI Environmental Services to EPA regarding the Work Plan, further discussion is needed concerning step-out criteria and an interim response action.

Thank you for your prompt response. Please direct any questions or comments to my attention at the address above. I can also be reached at (415) 972-3928 or moore.letitia@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Letitia D. Moore', with a long horizontal flourish extending to the right.

Letitia D. Moore
Assistant Regional Counsel

Enclosures

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IX

IN THE MATTER OF:

Oahu Sugar Company, LLC

Respondent

ADMINISTRATIVE ORDER ON CONSENT
FOR REMOVAL ACTION

U.S. EPA Region IX

CERCLA

Docket No. 2004-12

Proceeding Under Sections 104,
106(a), 107, 120, and 122 of the
Comprehensive Environmental
Response, Compensation and
Liability Act, as amended, 42

U.S.C. Sections 9604, 9606(a), 9607, 9620, and
9622.